

UNITED STATES DISTRICT COURT
for the
Southern District of Ohio

United States of America)
v.) Case No. 2:18-mj-940
SEAN HEISA)
aka: YUSEF ALI AKBAR MOHAMMED)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of between July 2017 and July 2018 in the county of Warren, Franklin and others in the
Southern District of Ohio, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 1038(A)(1)	False Information and Hoaxes; and
18 U.S.C. 876(c)	Mailing Threatening Communications

This criminal complaint is based on these facts:

See attached criminal complaint affidavit

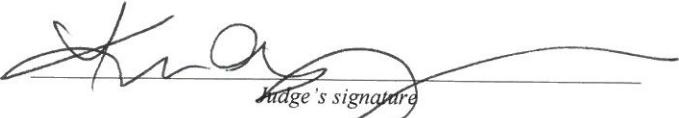
Continued on the attached sheet.


Complainant's signature

Stuart M. Bronstein, Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: December 31, 2018


Judge's signature

City and state: Columbus, OH

Magistrate Judge Kimberly Jolson
Printed name and title

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE MATTER OF THE
CRIMINAL COMPLAINT OF:

SEAN HEISA
aka: YUSEF ALI AKBAR MOHAMMED

MISC. NO. _____

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Stuart M. Bronstein, Special Agent, Federal Bureau of Investigation, being duly sworn, depose and say that:

Introduction and Purpose

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) assigned to the Columbus, Ohio Resident Agency. I am charged with the investigation of violations of federal statutes in the Southern District of Ohio. I have worked with the FBI since 2014. I have received specialized law enforcement training from the FBI. My duties as a Special Agent include conducting investigations of individuals and businesses that have violated federal law. I have participated in multiple such investigations.
2. I make this affidavit in support of a criminal complaint and arrest warrant of Sean Heisa, aka Yusef Ali Akbar Mohammed, hereinafter referred to as "HEISA", for violations of 18 U.S.C. § 1038(a)(1)- False Information and Hoaxes and 18 U.S.C. § 876(c) – Mailing Threatening Communications. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, your affiant did not include each and every fact known concerning this investigation. Instead, your affiant set forth only the facts that are believed to be necessary to establish probable cause that HEISA committed the violations listed above.
3. The information set forth in this affidavit is based upon my knowledge, training, experience, and participation in the investigation. This information is also based on the knowledge, training, experience, and investigations conducted by fellow law enforcement officers, which have reported to me either directly or indirectly.
4. Based upon my experience and the facts presented in this Affidavit, I submit there is probable cause to believe that HEISA engaged in conduct with intent to convey false or misleading

information under circumstances where such information may reasonably be believed and where such information indicates that an activity has taken, is taking, or will take place that would constitute a violation of chapter U.S.C. § 175(a) – Transfer of a Biological Agent or Toxin for Use as a Weapon, in violation of 18 U.S.C. § 1038(a)(1), to wit, the mailing of threatening letters containing a white powders substance. I further submit there is probable cause to believe that HEISA knowingly caused to be delivered a communication addressed to any person and containing any threat to kidnap any person or any threat to injure the person would constitute a violation of 18 U.S.C. § 876(c) – Mailing Threatening Communications.

Facts Supporting Finding of Probable Cause

5. At present, the investigation has revealed that between July of 2017 and July of 2018, HEISA wrote at least 17 letters containing threats similar to those described below and mailed such letters to people and offices across the State of Ohio. Post-*Miranda* interviews with HEISA on July 19, 2018 revealed admissions by HEISA to mailing all of the alleged letters, to include those letters signed with the alias Yusef Ali Akbar Mohammed.
6. For example, on or about August 29, 2017, in the Southern District of Ohio, HEISA did intentionally convey false and misleading information, under circumstances where such information may reasonably have been believed, and where such information indicated that an activity had taken, was taking or would take place, that would constitute a violation of 18 U.S.C. chapter 10, to wit: HEISA knowingly mailed from Lebanon, Ohio, an envelope containing a white, powdery substance addressed to “Monica S. Irelan” in Painesville, Ohio, with the intent to convey the false and misleading information that the powder contained anthrax, a biological agent and toxin; such conduct constituting a violation of Chapter 10, 18 U.S.C. § 175(a) – Transfer of a Biological Agent or Toxin for Use as a Weapon.
7. HEISA admitted to mailing the letter and using another individual’s name for the return address; he further admitted to signing the letter using the alias Yusef Ali Akbar Mohammed. HEISA used a different name for the sender to avoid suspicion from jail officials after mailing previous letters.
8. Additionally, on or about June 28, 2018, in the Southern District of Ohio, HEISA knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication addressed to “Gary Yost” in Jefferson, Ohio, which contained a threat to injure individuals identified therein, to wit: the defendant threatened to injure by exposure to fentanyl, a chemical agent.
9. The envelope containing this letter was marked with the name of the sender as Sean Heisa and included his inmate number. HEISA admitted to mailing the letter because the victim was a judge who gave someone HEISA knew a “whole bunch of time.”
10. Further, on or about July 2, 2018, in the Southern District of Ohio, the defendant, HEISA, knowingly mailed from Southern Ohio Correctional Facility, in Lucasville, Ohio, an envelope containing a white, powdery substance addressed to “Ohio State University” in

Columbus, Ohio, with the intent to convey the false and misleading information that the powder contained fentanyl, a chemical agent and toxin.

Conclusion

11. Based on the facts set forth in this affidavit, there is probable cause to believe that Sean Heisa, aka Yusef Ali Akbar Mohammed, committed violations of 18 U.S.C. § 1038(a)(1)- False Information and Hoaxes and 18 U.S.C. § 876(c) – Mailing Threatening Communications.

FURTHER AFFIANT SAYETH NAUGHT.



STUART M BRONSTEIN
Special Agent, FBI

Subscribed and sworn to before me,
this 31st day of December 2018.



THE HONORABLE KIMBERLY JOLSON
UNITED STATES MAGISTRATE JUDGE